

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re

CIRCUIT CITY STORES, INC., et al.,

Case No. 08-35653-KRH

Chapter 11

Debtors.

Jointly Administered

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*
FOR STEVEN T. HOORT AND HEATHER J. ZELEVINSKY

I, Lisa Taylor Hudson, an attorney and a member in good standing of the bars of the State of Virginia and the United States District Court for the Eastern District of Virginia (the “Movant”) hereby moves the Court to enter an order (the “Motion”), the proposed form of which is attached

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Counsel for T.J. Maxx of CA, LLC

hereto as **Exhibit A**, permitting Steven T. Hoort and Heather J. Zelevinsky (collectively, the “Admittees”), both with Ropes & Gray LLP (“Ropes”) to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia for the purpose of representing **T.J. Maxx of CA, LLC**, in the above-captioned Chapter 11 cases and any related adversary proceedings pursuant to Rule 2090-1(E) of the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia* (the “*Local Bankruptcy Rules*”). In support of this Motion, the Movant respectfully represents as follows:

1. Steven T. Hoort is a partner in the Bankruptcy and Business Restructuring Group of Ropes resident in its Massachusetts office. Mr. Hoort is admitted to practice before the Bars of the State of Massachusetts and the United States District Court for the District of Massachusetts, and the United States Court of Appeals for the Second Circuit. Mr. Hoort is a member in good standing and eligible to practice in every jurisdiction in which he has been admitted to practice. There are no disciplinary proceedings pending against Mr. Hoort in any jurisdiction and he has never been suspended or disbarred in any jurisdiction.

2. Heather J. Zelevinsky is an associate in the Bankruptcy and Business Restructuring Group of Ropes resident in its Massachusetts office. Ms. Zelevinsky is admitted to practice before the Bars of the State of Massachusetts and the United States District Court for the District of Massachusetts. Ms. Zelevinsky is a member in good standing and eligible to practice in every jurisdiction in which she has been admitted to practice. There are no disciplinary proceedings pending against Ms. Zelevinsky in any jurisdiction and she has never been suspended or disbarred in any jurisdiction.

3. The Movant requests that this Court grant this Motion so that these Admittees may appear and be heard at hearings in these chapter 11 cases.

WAIVER OF MEMORANDUM OF LAW

4. Pursuant to *Local Bankruptcy Rule* 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

NO PRIOR REQUEST

5. No prior request for relief sought herein has been made to this Court in these bankruptcy cases or to any other Court.

WHEREFORE, the Movant respectfully requests that this Court enter an order, substantially in the form attached hereto as **Exhibit A**, (i) authorizing the Admittees to practice *pro hac vice* and (ii) granting such other and further relief as is just and proper.

Respectfully Submitted,

T.J. MAXX OF CA, LLC

By Counsel

/s/ Lisa Taylor Hudson

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William A. Gray, Esquire (VSB# 46911)

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January, 2009, a true and accurate copy of the foregoing was electronically filed with Clerk of the Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and was mailed, by U.S. Mail, first class, postage prepaid, to all persons on the attached service list.

/s/ Lisa Taylor Hudson

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EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re

CIRCUIT CITY STORES, INC., et al.,

Debtors.

$$\begin{pmatrix} \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \end{pmatrix}$$

Case No. 08-35653-KRH
Chapter 11

Jointly Administered

**ORDER GRANTING MOTION TO PRACTICE *PRO HAC VICE*
FOR STEVEN T. HOORT AND HEATHER J. ZELEVINSKY
PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1 (E) (2)**

This matter came before the Court upon the Motion to Practice *Pro Hac Vice* (the

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Counsel for T.J. Maxx of CA, LLC

“Motion”) filed by Lisa Taylor Hudson of Sands, Anderson, Marks & Miller, P.C., seeking admission *pro hac vice* for Steven T. Hoort and Heather J. Zelevinsky, of the law firm of Ropes & Gray LLP, in the above-captioned bankruptcy proceeding on behalf of T.J. Maxx of CA, LLC pursuant to *Local Bankruptcy Rule* 2090-1(E)(2). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is required, and it is appropriate that Steven T. Hoort and Heather J. Zelevinsky be authorized to practice *pro hac vice* before the Court in the aforementioned bankruptcy proceeding, it is hereby accordingly,

ORDERED, ADJUDGED, AND DECREED that the Motion is hereby **GRANTED**;

It is further **ORDERED, ADJUDGED, AND DECREED** that Steven T. Hoort, may appear and practice *pro hac vice* in the above-captioned matter and any related proceedings on behalf of T.J. Maxx of CA, LLC; and

It is further **ORDERED, ADJUDGED AND DECREED** that Heather J. Zelevinsky, may appear and *practice pro hac vice* in the above-captioned matter and any related proceedings on behalf of T.J. Maxx of CA, LLC.

ENTERED ON THE DOCKET:

The Honorable Kevin R. Huennekens
United States Bankruptcy Judge

WE ASK FOR THIS:

/s/ Lisa Taylor Hudson

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LOCAL BANKRUPTCY RULE 9022-1(C) CERTIFICATION

Pursuant to *Local Bankruptcy Rule 9022-1 (C)*, I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Lisa Taylor Hudson